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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JASMINE AUSTION,

Defendant.

Case No: 2:22-cr-00010-JAD-VCF

Stipulation for a Protective Order

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the JASMINE AUSTION, the public, or any third party not directly related to this case, any and all unredacted discovery (the “Protected Material”) in this case. The parties state as follows:

1. On January 19, 2022, a grand jury returned an indictment charging AUSTION with three counts of *Bank Robbery*, in violation of 18 U.S.C. § 2113(a). ECF No. 17.
2. The trial is currently set for August 9, 2022. *See* ECF No. 26.
3. The government has already produced redacted discovery of approximately 238 Bates-stamped items to defense counsel.
4. The government has in excess of 100 media files related to the case that need to be reviewed prior to production to redact any personal identifying information of victims and/or witnesses. The government intends to review the media files, redact the files as

1 necessary, and provide a redacted copy to the defendant in due course for the defendant's
2 personal review of the discovery. However, due to the high volume of media files, the
3 government is unable to produce the discovery at the current time.

4 5. The parties are seeking a protective order to allow the attorney for the defendant
5 access to the media as soon as possible. As such, the parties stipulate to a protective order of the
6 protected material for the government to produce unredacted copies of the media to defense
7 counsel.

8 6. In order to protect the potential victims, witnesses, and unrelated persons
9 involved in and revealed by the Protected Material, the parties intend to restrict access to the
10 Protected Material in this case to the following individuals: attorneys for all parties, and any
11 personnel that the attorneys for all parties consider necessary to assist in performing that
12 attorneys' duties in the prosecution or defense of this case, including investigators, paralegals,
13 experts, support staff, interpreters, and any other individuals specifically authorized by the
14 Court (collectively, the "Covered Individuals"). The defendant JASMINE AUSTION shall not
15 review or obtain a copy of the Protected Material.

16 7. Without leave of Court, the Covered Individuals shall not:

- 17 a. make copies for, or allow copies of any kind to be made by any other person
18 of the Protected Material in this case or permit dissemination of the Protected
19 Material at the Southern Nevada Detention Center jail facility, or any other
20 detention facility where the Defendant is housed, to include leaving a copy of
21 the Protected Material at any detention facility where the Defendant is
22 housed;
- 23 b. allow any other person to view, listen, or otherwise review the Protected
24 Material;

- 1 c. use the Protected Material for any other purpose other than preparing to
2 defend against or prosecute the charges in the indictment or any further
3 superseding indictment arising out of this case; or
4 d. attach the Protected Material to any of the pleadings, briefs, or other court
5 filings except to the extent those pleadings, briefs, or filings are filed under
6 seal.

7 8. Nothing in this stipulation is intended to restrict the parties' use or introduction of
8 the Protected Material as evidence at trial or support in motion practice.

9 9. The parties shall inform any person to whom disclosure may be made pursuant
10 to this order of the existence and terms of this Court's order.

11 10. After the government produces a redacted copy of the media, defense counsel
12 shall return the unredacted version to the government.

13 11. The defense hereby stipulates to this protective order.

14 **DATED** this 1st day of March, 2022.

15 Respectfully submitted,

16 For the United States:

17 CHRISTOPHER CHIOU
18 Acting United States Attorney

19 /s/ Bianca R. Pucci
20 BIANCA R. PUCCI
Assistant United States Attorney

For the Defense:

RENE L. VALLADARES
Federal Public Defender

21 /s/ LaRonda R. Martin
22 LaRonda R. Martin
23 Assistant Federal Public Defender
24 Attorney for JASMINE AUSTION

IT IS SO ORDERED:

22 
23 Honorable Cam Ferenbach
United States Magistrate Judge

3-2-2022

Date